

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Charlottesville Division**

**JANE DOE,**

**Plaintiff,**

**v.**

**Case No. 3:23-cv-00018-RSB**

**RECTOR AND VISITORS OF THE  
UNIVERSITY OF VIRGINIA,**

**Defendant.**

**PLAINTIFF'S FED. R. CIV. P. 26(a)(3) PRETRIAL DISCLOSURES**

Plaintiff Jane Doe, through undersigned counsel, respectfully submits to this Court her Fed.

R. Civ. P. 26(a)(3) pretrial disclosures.

- (i) **the name and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises.**

**Witnesses Plaintiff expects to present**

1. Jane Doe
2. Manuel Diaz Ramirez
3. Andrew Verzilli
4. John Roe
5. Arya Royal, (434) 422-2854, witness recently moved and Plaintiff is working to identify her current address and will notify counsel for Defendant as soon as she has this information
6. Eleanore Gubitosa, 571-445-7200, 15050 Heathcote Blvd, Haymarket, VA 20169
7. Owen Gentry, 703-249-7700, 5999 Burke Commons Rd., Burke, VA 22015

8. Dr. Katherine Sznajder
9. Dr. Farimah Farahani

Witnesses Plaintiff may call if the need arises

1. Asher Biemann
2. Palma Pustilnik
3. Jeffrey Grossman
4. Ana Cisneros
5. Marpu Kurban
6. Farkhunda Paimani, phone number unknown
7. Kristin Zech
8. Any witnesses necessary for rebuttal or impeachment.
9. Any witnesses identified in Defendant's pretrial disclosures.

**(ii) the designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition**

Emily Babb deposition transcript, ECF No. 88-9

- 21:17-22:4
- 62:12-17
- 63:18-64:4
- 65:19-67:19
- 69:11-13

Asher Biemann deposition transcript, ECF No. 88-13

- 12:6-7
- 14-20
- 25:14-19
- 31:6-34:15
- 36:14-37:17
- 38:1-39:6
- 44:19
- 45:8

- 47:17-48:5
- 51:17-19
- 52:4-7
- 53-59
- 61:21-22
- 62:9-10
- 65:11-12, 14-16
- 66-67
- 69:7-15
- 71:12-21
- 72:9-21
- 73:3-20
- 74:2-21
- 75:4-21
- 78:8-14
- 80-81
- 84-85
- 95-98
- 99:16-17
- 100:1-2, 7-8
- 100:22-101:1-2
- 102-103

Manuel Diaz Ramirez deposition transcript, ECF No. 88-11

- 79:5-95:20

Parwiz Esmati deposition transcript, ECF No. 88-14

- 77:18-80:8

Akia Haynes Hale deposition transcript, ECF No. 88-10

- 19:3-20:11
- 54:3-62:2

John Roe deposition transcript, ECF No. 88-8

- 30:22-31:5

- (iii) **an identification of each document or other exhibit, including summaries of other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises.**

Exhibits Plaintiff expects to offer

1. Andrew Verzilli expert report, PLAINTIFF\_001735-41.
2. Kaiser Permanente pharmacy copay report, PLAINTIFF\_001808-14.
3. Draft investigation report and exhibits, UVA 000024-1234.
4. Final investigation report and exhibits, UVA 002446-4504.
5. Review panel determination, UVA 004538-43.
6. Elizabeth Magill letter, UVA 004544-45.
7. Akia Haynes letter, UVA 004546.
8. Emails between Doe and Casteen, UVA004547-90.
9. Defendant's July 12, 2024, interrogatory responses
10. Advisor list, UVA004602-04.
11. Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence, UVA004624-33.
12. Casteen emails, UVA004852-58.
13. Emails between Doe and Casteen, UVA004915-18.
14. Plaintiff email to Casteen, UVA008166.
15. Breen emails, UVA011820-21.

Exhibits Plaintiff may offer if the need arises

1. Andrew Verzilli CV, PLAINTIFF\_001730-34.
2. Casteen texts, PLAINTIFF\_003053-58.
3. Cisneros texts, PLAINTIFF\_003059-69.
4. Esmati texts, PLAINTIFF\_003070-81.

5. Plaintiff's medical records, PLAINTIFF 001806-3032, PLAINTIFF\_003802-5627, PLAINTIFF\_003802-5627, PLAINTIFF\_5638-6634.
6. Esmati texts, PLAINTIFF\_5635-37.
7. Notice of investigation, UVA 000001-05.
8. Amended notice of investigation, UVA 000011-15.
9. Second amended notice of investigation, UVA 000016-19.
10. Plaintiff's academic transcript, UVA 005162.
11. UVA list of people trained, UVA 005968.
12. Jeffrey Grossman letter, UVA009954-61.
13. DC OAHHR charge of discrimination, IMM024-26.
14. Any exhibits necessary for rebuttal or impeachment.
15. Any exhibits identified in Defendant's pretrial disclosures.

Dated: November 9, 2024

Respectfully submitted,

s/Elizabeth K. Abdnour

Elizabeth K. Abdnour

*Pro Hac Vice*

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 9<sup>th</sup> day of November, 2024, a true and accurate copy of the foregoing document was sent via email to the following individuals. Currently, the Court's CM/ECF system is not operational. This document will be filed using the Court's CM/ECF filing system when it is operational again, which will send an electronic notification to all counsel of record.

Hon. Robert S. Ballou, [ballou.ecf@vawd.uscourts.gov](mailto:ballou.ecf@vawd.uscourts.gov)  
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*s/ Elizabeth K. Abdnour*  
Attorney at Law